

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONNOLLY, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiffs,

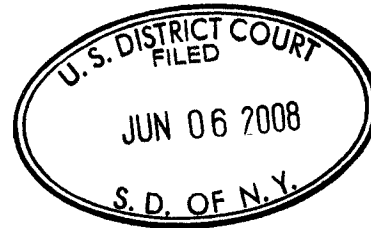
v.

AMERICAN INTERNATIONAL GROUP,  
INC., MARTIN J. SULLIVAN, STEVEN J.  
BENSINGER, JOSEPH J. CASSANO,  
ROBERT E. LEWIS, and DAVID L.  
HERZOG,

Defendants.

CIVIL ACTION NO. 08-cv-5072

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***



**NOTICE OF MOTION AND MOTION TO ADMIT COUNSEL *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Robert J. Shapiro, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

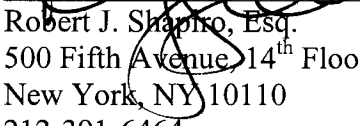
Applicant's Name: Christopher L. Nelson  
Firm Name: Schiffrin Barroway Topaz & Kessler, LLP  
Address: 280 King of Prussia Road  
City/State/Zip: Radnor, PA 19087  
Phone Number: (610) 667-7706  
Fax Number: (610) 667-7056  
Email Address: cnelson@sbtclaw.com

Christopher L. Nelson is a member in good standing of the Bar of the State of Pennsylvania. There are no pending disciplinary proceedings against Christopher L. Nelson in any State or Federal Court.

Dated: 6/5, 2008

Respectfully submitted,

**THE SHAPIRO FIRM, LLP**



Robert J. Shapiro, Esq.  
500 Fifth Avenue, 14<sup>th</sup> Floor  
New York, NY 10110  
212-391-6464

*Local Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONNOLLY, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP,  
INC., MARTIN J. SULLIVAN, STEVEN J.  
BENSINGER, JOSEPH J. CASSANO,  
ROBERT E. LEWIS, and DAVID L.  
HERZOG,

Defendants.

CIVIL ACTION NO. 08-cv-5072

**AFFIDAVIT OF ROBERT J. SHAPIRO IN  
SUPPORT OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

State of New York                     )  
  )  
County of New York                 )                 ss.

Robert J. Shapiro, being duly sworn, hereby deposes and says as follows:

1. I am a partner at The Shapiro Firm, LLP, Local Counsel for the Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the Plaintiffs' motion to admit Christopher L. Nelson as counsel *pro hac vice* to represent the Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on 6/22/94. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Nelson is an associate at Schiffrin Barroway Topaz & Kessler, LLP in Radnor, Pennsylvania.

4. I have found Mr. Nelson to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Christopher L. Nelson, *pro hac vice*.

6. In compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I have attached a Certificate of Good Standing for Mr. Nelson from Pennsylvania issued within the past thirty days.


7. I respectfully submit a proposed order granting the admission of Christopher L. Nelson, *pro hac vice*, which is also attached.

WHEREFORE it is respectfully requested that the motion to admit Christopher L. Nelson, *pro hac vice*, to represent the Plaintiff in the above-captioned matter, be granted.

Dated: 6/5, 2008

Respectfully submitted,

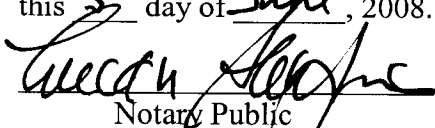
**THE SHAPIRO FIRM, LLP**

  
Robert J. Shapiro, Esq.  
500 Fifth Avenue, 14<sup>th</sup> Floor  
New York, NY 10110  
212-391-6464

*Local Counsel for Plaintiff*

Sworn to and subscribed before me

this 5<sup>th</sup> day of June, 2008.

  
Notary Public

LEONARD N. SHAPIRO  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 31-8938795  
QUALIFIED IN NEW YORK COUNTY  
COMMISSION EXPIRES JULY 28, 2010

LEONARD N. SHAPIRO  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 31-8938795  
QUALIFIED IN NEW YORK COUNTY  
COMMISSION EXPIRES JULY 28, 2010

**CERTIFICATE OF SERVICE**

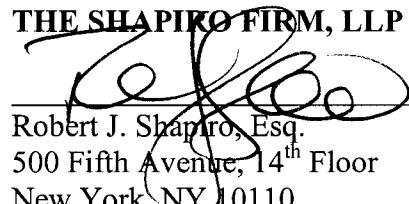
I, Robert J. Shapiro, hereby certify that I filed true and correct copies of the foregoing documents:

- *PRO HAC VICE* MOTION, AFFIDAVIT, AND PROPOSED ORDER.

with the Clerk of the Court on this date. The CM/ECF system will send notification to all participants registered for CM/ECF; those listed on the attached Service List not registered for CM/ECF will receive notification via first-class mail.

Dated: 6/5, 2008

**THE SHAPIRO FIRM, LLP**

  
Robert J. Shapiro, Esq.  
500 Fifth Avenue, 14<sup>th</sup> Floor  
New York, NY 10110  
212-391-6464

*Local Counsel for Plaintiff*

**SERVICE LIST**

American International Group, Inc.  
70 Pine Street  
New York NY 10270

Robert F. Carangelo, Esq.  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

*Incoming Attorneys for Defendants*



Supreme Court of Pennsylvania

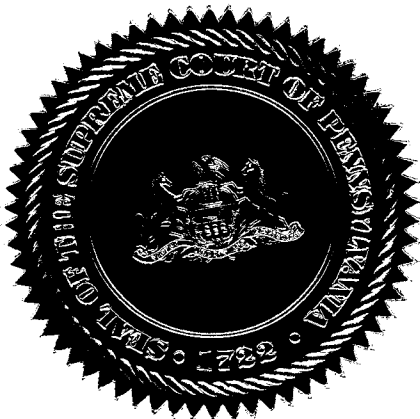
**CERTIFICATE OF GOOD STANDING**

***Christopher Leigh Nelson, Esq.***

**DATE OF ADMISSION**

***October 13, 2000***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: June 3, 2008**

John W. Person, Jr., Esq.  
Deputy Prothonotary

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JAMES CONNOLLY, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP,  
INC., MARTIN J. SULLIVAN, STEVEN J.  
BENSINGER, JOSEPH J. CASSANO,  
ROBERT E. LEWIS, and DAVID L.  
HERZOG,

Defendants.

CIVIL ACTION NO. 08-cv-5072

**ORDER FOR ADMISSION *PRO HAC*  
*VICE* ON WRITTEN MOTION**

Upon the motion of Robert J. Shapiro, Local Counsel for the Plaintiff, and said sponsor attorney's affirmation in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Christopher L. Nelson
Firm Name:	Schiffrin Barroway Topaz & Kessler, LLP
Address:	280 King of Prussia Road
City/State/Zip:	Radnor, PA 19087
Phone Number:	(610) 667-7706
Fax Number:	(610) 667-7056
Email Address:	cnelson@sbtclaw.com

is admitted to practice *pro hac vice* as counsel for the Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,



counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Richard J. Sullivan, U.S. District Judge